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7 Attorneys for Plaintiff  
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10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA

12 **United States of America,**

13 Plaintiff,

v.

14 **Katherine Kaplan,**

15 Defendant.

2:12-CR-488-LDG-VCF

MOTION FOR DOWNWARD  
DEPARTURE

17 The United States, by and through Daniel G. Bogden, United States Attorney, and  
18 Daniel R. Schiess, Assistant United States Attorney, moves for the court to grant the defendant a  
19 two-level downward departure for having provided substantial assistance. The defendant met with  
20 the FBI four times and provided information about the fraudulent scheme in which she was  
21 involved and is the basis of her conviction. The defendant's information was consistent with other  
22 information possessed by the FBI. The information may help the FBI advance the investigation of  
23 this matter.

24 DANIEL G. BOGDEN  
25 United States Attorney

26 /s/ Daniel R. Schiess

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DANIEL R. SCHIESS  
Assistant United States Attorney

## **Certificate of Service**

I certify that a copy of the foregoing motion was served on defense counsel of record through the court's electronic filing system.

Dated: April 26, 2013

/S/ Daniel R. Schiess

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Daniel R. Schiess

## ORDER

IT IS SO ORDERED.

DATED this 29th day of April, 2013.

Lloyd D. George  
Sr. U.S. District Judge